

Quinn,Robert E

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**From:** Quinn,Robert E  
**Sent:** Thursday, October 22, 2020 2:42 PM  
**To:** Darius Charney  
**Cc:** Claudia Wilner; Chinyere Ezie; Britney Wilson; jjoachim@cov.com  
**Subject:** RE: BLRR v. COB - Depositions

Just to confirm, at the conclusion of our meet and confirm on depositions, which you specifically advised was only as to depositions when I inquired last week, you mentioned "as heads up" that a motion to compel was forthcoming. I asked on what grounds and when, and you said it was in the emails and later today. I stated that I believed this was premature and inappropriate and both Mr. Charney and Ms. Wilner stated my objection was "duly noted" without any substantive or productive response. Again, I don't believe this level of gamesmanship is warranted or appropriate, particularly under present circumstances, and we'll obviously state this in our response to your allegedly forthcoming motion.

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**From:** Quinn,Robert E  
**Sent:** Thursday, October 15, 2020 1:19 PM  
**To:** Darius Charney <dcharney@ccrjustice.org>  
**Cc:** Claudia Wilner <wilner@nclej.org>; Chinyere Ezie <cezie@ccrjustice.org>; Britney Wilson <wilson@nclej.org>; jjoachim@cov.com  
**Subject:** Re: BLRR v. COB - Depositions

How about the 22 at 2?

Sent from my iPhone

On Oct 15, 2020, at 12:43 PM, Darius Charney <dcharney@ccrjustice.org> wrote:

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Rob-

The meet and confer is on the deposition issue only. We are available on the 22nd and 23rd after 3pm. Which of those do you prefer?

Darius

On Fri, Oct 9, 2020 at 5:38 PM Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us> wrote:

We do not consent to 70 depositions at this time. I believe the request is premature, there's no showing of a particularized need, and I don't see how the cited case supports your claim that 70 is the appropriate number of depositions in this case. With that said, we'll try to be reasonable and suggest that it would be more appropriate to revisit this issue as we move forward with discovery and depositions so that we have a better understanding of what will or will not be relevant, cumulative, and/or duplicative, etc.. Again, I disagree with the scripted language

about the inadequacy, so just note our disagreement and that that we don't believe its productive in moving this case forward.

Not clear if the meet and confer is on this issue only, or if there are other issues in your October 1, 2020 letter on protocol, or if the meet and confer is supposed to occur after you serve formal notice, etc., but if you'd like to schedule I would be available October 22, 23, or 24 (after 3p.m).

I would like to get some depositions scheduled so hopefully we can speak about that or provide some dates as soon as possible. Thanks.

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**From:** Claudia Wilner [mailto:[wilner@nclej.org](mailto:wilner@nclej.org)]  
**Sent:** Thursday, October 08, 2020 3:06 PM  
**To:** Quinn, Robert E <[rquinn@ch.ci.buffalo.ny.us](mailto:rquinn@ch.ci.buffalo.ny.us)>  
**Cc:** Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Chinyere Ezie <[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)>;  
Britney Wilson <[wilson@nclej.org](mailto:wilson@nclej.org)>; [jjoachim@cov.com](mailto:jjoachim@cov.com)  
**Subject:** RE: BLRR v. COB - Depositions

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Rob, we never heard from you. Will Defendants consent to 70 depositions? If not, please provide some times for a meet and confer. Thank you.

<image002.jpg> **Claudia Wilner**

Director of Litigation and Advocacy (pronouns she/her)

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**From:** Quinn,Robert E <[rquinn@ch.ci.buffalo.ny.us](mailto:rquinn@ch.ci.buffalo.ny.us)>  
**Sent:** Friday, October 2, 2020 8:15 AM  
**To:** Claudia Wilner <[wilner@nclej.org](mailto:wilner@nclej.org)>  
**Cc:** Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Chinyere Ezie <[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)>;  
Britney Wilson <[wilson@nclej.org](mailto:wilson@nclej.org)>; [jjoachim@cov.com](mailto:jjoachim@cov.com)  
**Subject:** RE: BLRR v. COB - Depositions

Received. I'll review with my boss and respond by the end of the day.

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**From:** Claudia Wilner [<mailto:wilner@nclej.org>]  
**Sent:** Thursday, October 01, 2020 9:06 PM  
**To:** Quinn,Robert E <[rquinn@ch.ci.buffalo.ny.us](mailto:rquinn@ch.ci.buffalo.ny.us)>  
**Cc:** Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Chinyere Ezie <[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)>;  
Britney Wilson <[wilson@nclej.org](mailto:wilson@nclej.org)>; [jjoachim@cov.com](mailto:jjoachim@cov.com)  
**Subject:** BLRR v. COB - Depositions

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Rob, please see the attached letter concerning depositions.

<image003.jpg> **Claudia Wilner**

Director of Litigation and Advocacy (pronouns she/her)

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**Darius Charney**  
Senior Staff Attorney  
*Pronouns: He/Him*

**Center for Constitutional Rights | Justice takes a fight.**  
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